

U.S. Department of  
Homeland Security

United States  
Coast Guard



Officer in Charge, Marine Inspection  
United States Coast Guard  
Marine Safety Office Puget Sound  
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16712/ EMPRESS  
July 1, 2003

American West Steamboat Company  
Attn: Mr. Kerry Duke  
2101 Fourth Ave. Suite 1150  
Seattle, WA 98121

### EMPRESS OF THE NORTH MANNING

We have reviewed your manning proposal submitted with your letter of May 7, 2003 as well as revisions submitted by electronic mail on May 29 and June 11, 2003. Your vessel is a 298 GT (US), 6,300 GT (ITC) vessel that will be certificated to carry 235 passengers on the Columbia, Snake, and Willamette Rivers, and on an International Route (Lakes, Bays and Sounds) between Seattle to Alaska via British Columbia, Canada. Your vessel will be inspected as a passenger vessel under 46 CFR Subchapter H and will be subject to the International Convention for Safety of Life at Sea (SOLAS) and the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 as amended in 1995 (STCW 95).

Your vessel shall be manned with the following licensed and unlicensed personnel, in which there must be included seven certificated lifeboatmen.

1 Master	1 Chief Engineer
3 Licensed Mates	2 Licensed Assistant Engineers
4 Able Seamen - Limited	2 Oilers
2 Ordinary Seamen	1 Wiper
	1 Patrolman

We note that you intend to exceed these requirements, particularly with regard to engineering, by employing:

1 Master (non-watchstanding)	1 Chief Engineer (non-watchstanding)
3 Licensed Mates	3 Licensed Assistant Engineers
4 Able Seamen - Limited	1 Qualified Member of Engine Department
2 Ordinary Seamen	4 Maintenance Division (OS/ Wipers)

The required deck officers shall all be licensed for at least 1600 tons. You have the option of carrying additional licensed mates for purposes, as you suggest, of giving mates of lesser license a path for advancement.

When not sailing on register and operating upon the navigable waters of the United States, all deck officers shall meet the requirements as First Class Pilot of inspected vessels of not more than 1600 gross registered tons (GRT) on both designated and non-designated pilotage waters in accordance with 46 CFR 15.812(b)&(c) and Table 15.812(e)(1).


A supervised patrol is to be provided in accordance with 46 CFR 78.30-10.

Although the EMPRESS OF THE NORTH is 6300 gross tons per the International Tonnage Convention (ITC), a recent Memorandum of Understanding between Transport Canada Marine Safety and the U.S. Coast Guard regarding mariner qualifications will allow this vessel to operate within Canada at the manning levels and qualifications as we establish for domestic trade. Thus, the above manning is acceptable for the intended domestic and international route of this vessel.

The assigned manning level above includes that of a fully manned engine room. Acceptance of reduced engine room manning is contingent upon submittal of a reduced manning request in accordance with the Marine Safety Manual, Volume III, satisfactory testing during a trial period (3000 hours), and technical review of the Failure Modes Effects Analysis and Design Verification Test Procedures by the U. S. Coast Guard Marine Safety Center.

Questions regarding the manning level may be directed to Mr. Nic Ruiz or Mr. John Veentjer of my vessel inspections staff.

Sincerely,

  
D. ELLIS  
Captain, U.S. Coast Guard  
Officer in Charge, Marine Inspection  
Captain of the Port

Copy: CCGD13(m)  
MSO Portland, OR  
MSO Juneau  
USCG MSC